

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	17-29782
Carol Woods	)		
Debtor	)	Chapter:	Chapter 13
	)		
	)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

To: Carol Woods, 18110 Roy Street, Lansing, IL, 60438

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **August 1, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **Timothy A. Barnes** at 219 S. Dearborn, Courtroom 744, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 7/11/2019.

By: /s/Dale Riley  
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

Align Loans  
C/O LendingTree, LLC  
11115 Rushmore Drive  
Charlotte NC 28277

Rent-A-Center  
Bankruptcy Department  
8548 S. Cottage Grove Ave.  
Chicago IL 60619

AmeriCash Loans  
Bankruptcy Department  
1612 W. 59th St.  
Chicago IL 60636

Snap-On Credit, LLC  
Bankruptcy Department  
1760 W 2100 S  
#26561  
Salt Lake City UT 84199

Cash Advance  
Bankruptcy Dept.  
2533 N. Carson Street  
Suite 4976  
Carson City NV 89706

Webbank/Fingerhut  
Attn: Bankruptcy Dept.  
6250 Ridgewood Rd  
Saint Cloud MN 56303

Corp. America Family C  
Attn: Bankruptcy Dept.  
2075 Big Timber Rd  
Elgin IL 60123

Credit Acceptance  
Attn: Bankruptcy Dept.  
Po Box 513  
Southfield MI 48037

Exeter Finance  
Attn: Bankruptcy Dept.  
Po Box 166097  
Irving TX 75016

Illinois Department of Revenue  
Bankruptcy Department  
PO Box 19044  
Springfield IL 62794-9044

Illinois Lending  
Bankruptcy Dept  
3455 S Ashland Ave  
Chicago IL 60608

MABT/Contfin  
Attn: Bankruptcy Dept.  
121 Continental Dr Ste 1  
Newark DE 19713

Makes Cents, Inc  
Attn: Customer Support  
PO Box 10  
Parshall ND 58770

MID AMERICA BK/TOTAL C  
Attn: Bankruptcy Dept.  
5109 S Broadband Ln  
Sioux Falls SD 57108

Navient  
Attn: Bankruptcy Dept.  
Po Box 9500  
Wilkes Barre PA 18773

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<b>In Re:</b>  <b>Carol Woods</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 17-29782</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Timothy A. Barnes</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Ms. Carol Woods (the “Debtor”), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 10/04/2017.
3. The Debtor’s plan was confirmed by the Court on 12/21/2017.
4. The Debtor is off work for 1 month for medical reasons. While she is off work she will be unable to afford her plan payments. See Exhibit A.
5. Additionally the Debtor will be unable to afford her plan payment in her first month back to work as she will need her full paycheck to catch up on her regular expenses that she will fall behind on while she is off work.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to suspend plan payments for 2 months.

Court enter an order:

1. Suspending plan payments for 2 months,
2. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960